

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

LAURA ABRAMS on behalf of herself
and all others similarly situated,

Plaintiff,

v.

THE SAVANNAH COLLEGE OF ART
AND DESIGN, INC.,

Defendant.

CIVIL ACTION NO.
1:22-CV-04297-LMM

**PLAINTIFF’S UNOPPOSED AMENDED MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT AND PRELIMINARY
CERTIFICATION OF SETTLEMENT CLASS**

Under Federal Rule of Civil Procedure Rule 23(e), and subject to Court approval, Plaintiff Laura Abrams (“Plaintiff”), on behalf of herself and all others similarly situated, respectfully moves the Court for preliminary approval of the proposed settlement of this class action under Rule 23 of the Federal Rules of Civil Procedure.

Plaintiff requests that the Court grant the Amended Motion and enter a Preliminary Approval Order (a) preliminarily certifying the Settlement Class, appointing Class Representatives for the Settlement Class, and appointing Class Counsel as counsel for the Settlement Class; (b) preliminarily approving the proposed settlement as appearing sufficiently fair, adequate, and reasonable to warrant the dissemination of the Class Notice; and, (c) granting any related relief as

described in the attached memorandum in support. Defendant, The Savannah College of Art and Design, Inc., has reviewed this filing and does not oppose this motion.

Plaintiff's efforts have resulted in a proposed \$375,000 non-reversionary common fund settlement on behalf of herself and the Settlement Class that was negotiated at arm's-length. As explained in the supporting Memorandum, this proposed settlement is fair, reasonable, adequate, and in the Settlement Class's best interest. A proposed order granting this unopposed Motion is attached as **Exhibit 1**. The Settlement Agreement and Release Agreement ("Settlement Agreement") is attached as **Exhibit 2**, which includes reference to the Notice that will be distributed to potential Settlement Class Members via regular U.S. mail (Exhibit D to the Settlement Agreement). Also attached to the Settlement Agreement are the proposed Claim Form (Exhibit A to the Settlement Agreement) and Long Form Notice (Exhibit B to the Settlement Agreement), which will be posted on the Settlement Website, www.savannahcollegedatasettlement.com. The Amended Declaration of Terence R. Coates in Support of Preliminary Approval is attached as **Exhibit 3** ("Coates Decl.") and the Declaration of Christopher Longley from Atticus Administration, LLC is attached as **Exhibit 4** ("Atticus Decl.").

For the reasons described in the supporting Memorandum, Class Counsel respectfully ask the Court to enter an Order: (1) certifying the Class for purposes of

settlement; (2) appointing Abrams as representative of the Settlement Class; (3) appointing the undersigned counsel as Class Counsel; (4) granting preliminary approval of the proposed Settlement; (5) approving the proposed form and manner of notice to the Settlement Class; (6) directing that the Notice to the Settlement Class be disseminated by the Settlement Administrator, in the manner described in the Settlement; (7) establishing a deadline for Settlement Class members to request exclusion from the Settlement Class or file objections to the Settlement; and (8) setting the proposed schedule for completion of further settlement proceedings, including scheduling the Final Approval Hearing.

Respectfully submitted this 31st day of March, 2023.

/s/ N. Nickolas Jackson

N. Nickolas Jackson

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**CERTIFICATE OF SERVICE AND
LOCAL RULE 7.1(D) CERTIFICATION**

I hereby certify that on March 31, 2023, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send notification of such filing and effectuate service to all counsel of record in this matter, pursuant to Local Rule 5.1.

I further certify that this motion has been prepared with one of the fonts and point selections approved by the Court in Local Rule 5.1(C).

/s/ N. Nickolas Jackson
N. Nickolas Jackson

*Counsel for Plaintiff and the Settlement
Class*